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December 4, 1996

VIA HAND DELIVERY

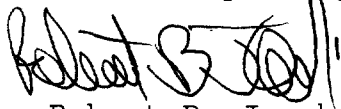
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Secretary

On November 25, 1996, Channel 51 of San Diego, Inc., licensee of Television Station KUSI, San Diego, California, filed Comments in the Digital Television Rule Making proceeding (MM Docket No. 87-268). The "original" of the Channel 51 Comments contained a fax signature page. Enclosed herewith is a complete copy of the Channel 51 comments which includes a signature page bearing the "original" signature of Michael McKinnon, Jr., an officer of the licensee - together with pages referenced in footnotes 1 and 2.

It is respectfully requested that the enclosed document be associated with the Channel 51 Comments filed on November 25, 1996.

Yours very truly,


Robert B. Jacobi



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In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

)MM Docket No. 87-268

RECEIVED

DEC 4 1996

Federal Communications Commission
Office of Secretary

TO: The Commission

COMMENTS OF CHANNEL 51 OF SAN DIEGO, INC., ON THE SIXTH NOTICE OF PROPOSED RULEMAKING

Channel 51 of San Diego, Inc., licensee of Television Station KUSI-TV, San Diego, CA, (hereinafter KUSI) respectfully submits it's limited Comments in the above-referenced proceeding.

KUSI operates on NTSC Channel 51, San Diego, CA. The Commission's DTV Table of Allocations proposes KUSI operation on DTV Channel 52. Such operation will create unnecessary adjacent channel interference, cause new interference with a co-channel NTSC station and, consequently, will result in less than adequate replication.

The pairing of adjacent channel stations at the same transmitter site will result in interference to KUSI's NTSC Channel 51 facility adversely affecting the quality of the ultimate product delivered to viewers. Operation on DTV Channel 52 will cause video noise in the KUSI Channel 51 NTSC signal - due to DTV IMD spectral reading. Filters, while helpful, will not eliminate the problem. Moreover, the use of filters will impair the ability to operate Channel 51 at full stereo with the SAP and PRO channels. With respect to the Channel 51 picture quality, the adjacent DTV signal will cause artifacts or beat patterns. Again, while remedial action can

be taken (locking the pilot and carrier frequencies), the problem will not be eliminated.^{1/} The final result to KUSI will be the loss of audience - essentially the same result flowing from newly created interference.

The Commission's proposals for San Diego are as follows:

NTSC Channels	DTV Channels
8	23
10	29
15	17
39	40
51	52
69	46

Even the most cursory observation demonstrates that there is no reason to pair adjacent channel stations. Pairing without resort to adjacencies is patently possible within the contemplated DTV allocations.

In addition to the aforesaid channel pairing problem, there will be interference between KUSI's DTV Channel 52 operation and the co-channel NTSC operation of Station KVEA, Corona, CA. The Corona transmitter site is located atop Mt. Wilson (5896ft above sea level); the KUSI transmitter site is located atop Mt. Miguel (2649ft above sea level). The two sites are within 199 kilometers of each other. The KVEA NTSC Channel 52 Grade B signal will overlap KUSI's DTV signal by approximately 12.5 miles.^{2/} Terrain shielding, which recognizably can be a factor in reducing interference, will be of little consequence between the KUSI Channel 52 DTV operation and NTSC co-channel Station KVEA due to the elevation of each station's transmitter site.

Replication on DTV Channel 52 of the KUSI Channel 51 signal is also affected by the Commission's proposal to base coverage on the existing facilities. Realistically, in order to achieve meaningful replication, KUSI anticipates that it will require additional power, an increase

^{1/} Practical ATV Transmission Implementation issues, IBC '96 Engineering Conference, September 14, 1996.

^{2/} Television & Cable Fact Book, Volume 64, See Attachment.

in tower height or a combination of both. Pragmatically, and considering that DTV is essentially "untried", the Commission should adopt rules providing sufficient flexibility for modification - in order to achieve meaningful replication.

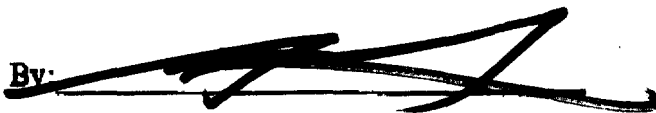
The Commission's San Diego DTV allotment proposal area is further complicated by the unresolved problem with Mexico - pertaining to prospective Mexican DTV allocations.^{3/} KUSI supports the allocation of additional spectrum nation-wide for DTV purposes. Should the Commission reject the request for additional spectrum, KUSI suggests that the San Diego area merits separate consideration. The proximity of a relatively large number of Mexican stations and existing (but unused) allocations presents a unique spectrum problem - which may only be resolved by the allocation of additional spectrum to the San Diego area.

The unnecessary pairing of Channels 51 and 52 will adversely affect the quality of the NTSC product and, consequently, the ultimate audience size. Moreover, replication on DTV Channel 52 realistically cannot be anticipated because of co-channel interference. The overall spectrum situation is further complicated by the unresolved problem with Mexico. In this posture, KUSI recommends that all of these factors be carefully evaluated prior to the finalization of a DTV allocation table.

Respectfully Submitted

CHANNEL 51 OF SAN DIEGO, INC.

Date: 11/25/96

By: 

^{3/} Indeed, the NPRM reflects existing short spacing problems between proposed DTV allocations and existing Mexican NTSC allocations for several of the San Diego stations, See NPRM, Footnote 93.

California—Corona-Los Angeles

KVEA

Ch. 52

Network Service: Telemundo.

Licensee: Estrella License Corp., 1130A Air Way, Sales & Administration Bldg., Glendale, CA 91201.

Studio: 1139 Grand Central Ave., Glendale, CA 91201.

Telephone: 818-502-5700. Fax: 818-502-0029.

Technical Facilities: Channel No. 52 (698-704 MHz). Authorized power: 2630-kw max. & 1320-kw horizontal visual, 261-kw max. & 132-kw horizontal aural. Antenna: 2890-ft. above av. terrain, 199-ft. above ground, 5856-ft. above sea level.

Latitude 34° 13' 27"
Longitude 118° 03' 45"

Holds CP for change to 2570-kw max. visual, 2940-ft. above av. terrain, 226-ft. above ground, 5896-ft. above sea level. BPCT-950808KE.

Transmitter: Mount Wilson.

Satellite Earth Stations: Miralite, 2.4-meter Ku-band; Miralite, 3.7-meter Ku & C-band; Vertex, 6.1-meter C-band; DX Engineering, Harris, M/A-Corn receivers.

News Services: AP, CNN, CNS, Imevision, UPI.

Ownership: Telemundo Group Inc. (Group Owner).

Began Operation: June 29, 1966. Sale to present owner by Oak Industries approved by FCC July 17, 1985 (*Television Digest*, Vol. 25:7, 21). Sale of 50% to Oak Industries by A. Jerrold Perenchio approved April 15, 1983. Sale to Oak & Perenchio by Kaiser Bcstg. Corp. approved by FCC Aug. 24, 1976. Began subscription television April 1, 1977 (Vol. 17:15). Began Spanish language broadcasting Sept. 8, 1980.

Represented (sales): Telemundo.

Represented (legal): Hogan & Hartson.

Personnel:

Michael Martinez, Vice President & General Manager.
Roland Hernandez, General Sales Manager.
Don Buck, National Sales Manager.
Glen McJennett, Director, Engineering.



KVEA BPCT-950808KE Granted 9/22/95 © American Map Corp., No. 14244

Karen Harmon, Controller.

Michael Newcomb, Production Director.

Rates: On request.

City of License: Corona. **DMA:** Los Angeles. **Rank:** 2.

Circulation ©1995 Nielsen. Coverage based on Nielsen study.

	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	3,902,160	2,339,320	6,241,480
Average Weekly Circulation (1995)	106,348	312,128	417,637
Average Daily Circulation (1995)			209,759

*Estimated station totals are sums of the Nielsen TV and Cable TV household estimates for each county in which the station registers viewing as per the Nielsen Survey Methods.

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ands

Banning

aim Springs

dido

cajon

Grove

City

Vista

d

No. 14244

Total
V Households
5,946,880
401,066
156,844

ch county in which

California—San Diego

KUSI-TV

Ch. 51

Network Service: UPN.

Licensee: Channel 51 of San Diego Inc., Box 719051, San Diego, CA 92171.

Studio: 4575 Viewridge Ave., San Diego, CA 92123.

Mailing Address: Box 719051, San Diego, CA 92171.

Telephone: 619-571-5151. **Fax:** 619-571-4852.

Technical Facilities: Channel No. 51 (692-698 MHz). Authorized power: 2880-kw max. visual, 288-kw max. aural. Antenna: 1840-ft. above av. terrain, 169-ft. above ground; 2649-ft. above sea level.

Latitude 32° 41' 52"
Longitude 116° 56' 02"

Transmitter: Mount San Miguel, 13-mi. E of San Diego.

Satellite Earth Stations: Scientific-Atlanta, 4.5-meter Ku-band; Scientific-Atlanta, 7-meter C-band; M/A-Corn, Scientific-Atlanta receivers.

News Services: AP, CNN, Conus.

Ownership: McKinnon Broadcasting Co. (Group Owner).

Began Operation: September 13, 1982. Transfer of control to McKinnon Broadcasting Co. from United States International University approved by FCC April 10, 1990 (Television Digest, Vol. 30:8).

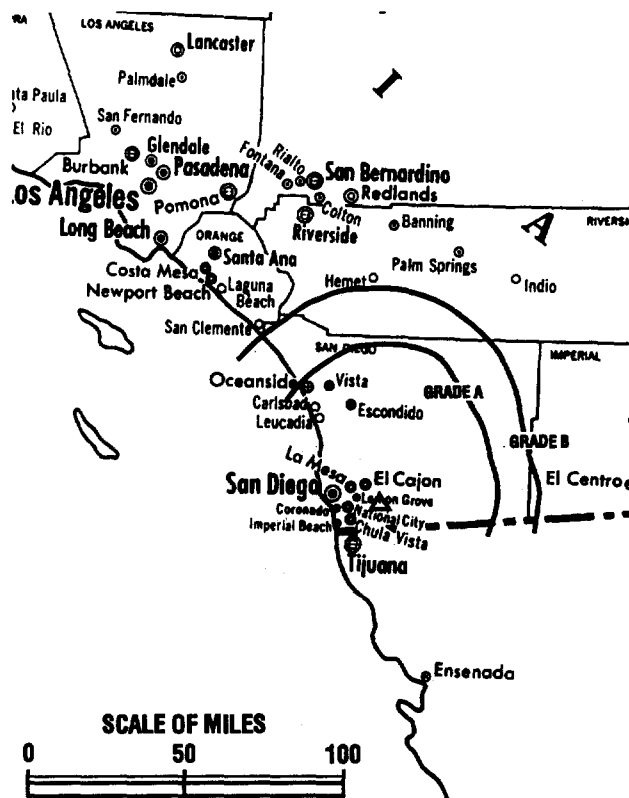
Represented (sales): Katz Independent Television.

Represented (legal): Cohn & Marks.

Represented (engineering): Jules Cohen & Associates, P.C.

Personnel:

Michael D. McKinnon, President & General Manager.
Mike McKinnon II, Vice President, Broadcast Operations & Programming.
Al Hilesen, Vice President, News & Program Development.
Jody Ritchey, National Sales Manager.
Richard Tuininga, News Director.
Tom McCarthy, Promotion Director.
Joe Twohig, Operations Manager.
Richard Large, Chief Engineer.
Robert Otraba, Business Manager.



KUSI-TV BMPCT-810630KE Granted 9/10/81 © American Map Corp., No. 14244

Daria Davis, Community Affairs Director.
Kiat Tohsakul, Traffic Manager.
Robert Liwag, Research Director.

Rates: On request.

City of License: San Diego. **DMA:** San Diego. **Rank:** 27.

Circulation © 1995 Nielsen. Coverage based on Nielsen study.

	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	725,460	189,690	915,150
Average Weekly Circulation (1995)	409,159	87,826	496,926
Average Daily Circulation (1995)			194,012

*Estimated station totals are sums of the Nielsen TV and Cable TV household estimates for each county in which the station registers viewing as per the Nielsen Survey Methods.

Total TV Households
3,877,458
194,927
50,339

each county in which